

# EXHIBIT I

Jason Kenny

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

SOLOMAN OLUDAMISI AJIBADE and	)	
ADENIKE HANNAH AJIBADE, as	)	
natural parents of Mathew	)	
Ajibade, and	)	
	)	
THE ESTATE OF MATHEW AJIBADE	)	
and CHRIS OLADAPO, its	)	
Executor,	)	
	)	
Plaintiffs,	)	CIVIL ACTION NO.
	)	
vs.	)	4:16-CV-82-WTM-GRS
	)	
JOHN WILCHER, in his official	)	
capacity as Chatham County	)	
Sheriff, et al.,	)	
	)	
Defendants.	)	

VIDEOTAPED DEPOSITION OF

JASON KENNY

September 12, 2016

9:34 a.m.

218 West State Street

Savannah, Georgia

Mynjuan P. Jones, RPR, CCR-B-1422

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1 APPEARANCES OF COUNSEL

2 On behalf of the Plaintiffs:

3 MARK M. O'MARA, Esq.  
O'Mara Law Group  
4 221 NE Ivanhoe Boulevard, Suite 200  
Orlando, Florida 32804  
5 mark@omaralawgroup.com

6 TROY A. RAFFERTY, Esq.  
WILLIAM F. CASH, III, Esq.  
7 Levin, Papantonio, Thomas, Mitchell, Rafferty  
& Proctor, P.A.  
8 316 South Baylen Street  
Suite 600  
9 Pensacola, Florida 32502  
trafferty@levinlaw.com  
10 bcash@levinlaw.com

11 CAMERON C. KUHLMAN, Esq.  
The Claiborne Firm, P.C.  
12 410 East Bay Street  
Savannah, Georgia 31401  
13

14 On behalf of the Defendants Debra Johnson and Andrew  
Evans-Martinez:

15 BENJAMIN PERKINS, Esq.  
16 Oliver Maner, LLP  
218 West State Street  
17 Savannah, Georgia 31401  
bperkins@olivermaner.com  
18  
19  
20  
21  
22  
23  
24  
25

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1 On behalf of the Defendants Corizon Health, Corizon,  
and Gregory Brown:

2

THOMAS S. CARLOCK, Esq.  
3 Carlock Copeland  
191 Peachtree Street, NE  
4 Suite 3600  
Atlanta, Georgia 30303-1740  
5 tcarlock@carlockcopeland.com

6 THOMAS A. WITHERS, Esq.  
Gillen, Withers & Lake, LLC  
7 8 East Liberty Street  
Savannah, Georgia 31401  
8 twithers@gwllawfirm.com

9

On behalf of the Defendant Sheriff John Wilcher:  
10

R. JONATHAN HART, Esq.  
11 JENNIFER R. BURNS, Esq.  
Chatham County Attorney's Office  
12 124 Bull Street  
Suite 240  
13 Savannah, Georgia 31401  
jburns@chathamcounty.org  
14

15 Also Present:  
Debra Johnson  
16 Gregory Brown  
Dave Liebhauser, Videographer  
17

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1 A. A muffle.

2 Q. Okay. You didn't hear the noise of the  
3 Taser?

4 A. No. That doesn't sound like a Taser to  
5 me.

6 Q. Okay. Just move it forward.

7 MR. CASH: That was a minute one second  
8 one.

9 Q. (By Mr. O'Mara) Stop. What are you doing  
10 there?

11 A. I drive-stun him.

12 Q. Where did you get him?

13 A. On the thigh.

14 Q. Where on the thigh?

15 A. Like the middle right thigh.

16 Q. You pointed to -- and you can't be seen on  
17 the camera. You want to just stand up and tell us  
18 where that is.

19 A. Right here (indicating), middle thigh,  
20 middle right thigh.

21 Q. What do you mean by middle when you say  
22 middle --

23 A. The middle. Am I saying that right?

24 Q. I don't know. It's your testimony.

25 A. Is this the middle? The middle, you cut

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1 in half, this is the middle, like that (indicating).

2 Q. Okay. And that -- it's your testimony  
3 that's where you drive-stunned him on this video?

4 A. That looks like -- from the video that  
5 looks like wherever --

6 Q. Okay. Let's let it run. I think that's  
7 about it. Let's back up about 15 seconds and see  
8 where we are.

9 MR. CASH: I'm going to start at a minute  
10 one.

11 MR. O'MARA: Back up some more. Just back  
12 up another 15 seconds from there.

13 MR. CASH: Okay. This would be a second  
14 forty-seven.

15 Q. (By Mr. O'Mara) Okay. Stop. Now, we are  
16 where we are before, which is what I -- where is  
17 that?

18 A. The thigh.

19 Q. Okay. And that's the -- would you agree  
20 that's the upper thigh?

21 A. Yes.

22 Q. And it is looking on top of, is it not,  
23 the actual underwear that he has on him; is that  
24 accurate?

25 A. Uh-huh.

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1           Q.     Okay. Let's just let it run. How long  
2     did you drive-stun him that time?

3           A.     I don't remember. I think that was the  
4     five-second one. I don't remember which amount of  
5     time. I know I try not -- that was the only time I  
6     gave him -- I did a five-second one, but I don't  
7     remember exact time.

8           Q.     And what is that other noise that you hear  
9     as you're drive-stunning him?

10          A.     Him screaming.

11          Q.     Do you remember where in the scheme of the  
12     other drive-stuns this one was?

13          A.     (Shakes head negatively).

14          Q.     You have to answer out loud.

15          A.     No, ma'am.

16          Q.     This seems to have -- from the --  
17     presuming for the today's moment that the timing is  
18     accurate, that was earlier on in the process and that  
19     there were drive-stuns afterwards? Does that make  
20     sense to you or no?

21          A.     I really don't recall.

22          Q.     So tell me what happened with the last  
23     drive-stun, whenever that was, whichever video this  
24     was. Tell me about that one.

25          A.     After?

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1 Q. You decided to use the Taser?

2 A. Yes.

3 Q. Four times, correct?

4 A. Yes.

5 Q. You decided to make sure you got him in  
6 the restraint chair, correct?

7 A. Yes.

8 Q. Those are all decisions you made based  
9 upon the available information, correct?

10 A. Yes.

11 Q. And your duties, right?

12 A. Yes.

13 Q. I'm asking whether or not those decisions  
14 that you made would have been different if you had  
15 the information available to you that he was a mental  
16 health concern and that he had come into the jail  
17 with some mental health medication? Would that have  
18 impacted your decision?

19 A. No.

20 Q. None whatsoever?

21 A. He would still have to go in the restraint  
22 chair.

23 Q. Okay. One thing you said was you would  
24 have put him in the detox cell to be observed?

25 A. Yes.